## UNITED STATES DISTRICT COURT DISTRICT OF RHODE ISLAND

THE ESTATE OF YARON UNGAR, et al.,

Plaintiffs – Judgment Creditors,

v. C.A. No. 00 - 105L

THE PALESTINIAN AUTHORITY, et al.,

Defendants – Judgment Debtors.

## **CONSENT MOTION TO FOR TWO ONE DAY ENLARGEMENTS**

Plaintiffs respectfully move for a one day enlargement of the current deadlines to respond to Defendants' motion for protective order regarding the deposition of Ahmed Qurei (dkt. # 528) and Defendants' motion to compel (dkt. # 530). In support of their motion, Plaintiffs state as follows:

- On September 9, 2010 Defendants filed a motion for protective order (dkt. # 528)
  concerning the deposition of Ahmed Qurei which Plaintiffs had previously
  noticed. The deadline for Plaintiffs' response is September 27, 2010.
- 2. A significant portion of Defendants' memorandum in support of their motion involves issues pertaining to a prior deposition of Mr. Qurei in *Saperstein v. Palestinian Authority*. Accordingly, Plaintiffs will support their response to the motion with a declaration from the *Saperstein* Plaintiffs' counsel Norman Steiner. Due to a death in his family on September 26, 2010, Mr. Steiner has been unable

to finalize his declaration but expects to do so on September 28, 2010.

Accordingly, Plaintiffs seek a one day enlargement to allow them to file their

response on September 28, 2010.

3. On September 14, 2010 Defendants filed a motion to compel (dkt. # 530)

concerning Plaintiffs' interrogatory answers and responses to document requests.

The deadline for Plaintiffs' response is October 1, 2010.

4. The response date, October 1, 2010, is the last of a series of Jewish religious days

in which Plaintiffs' counsel is court excused. Accordingly, Plaintiffs seek a one

business day enlargement to allow them to file their response on October 4, 2010.

5. Counsel for Plaintiffs sought the consent of Defendants to this request via email

on September 27, 2010.

6. Counsel for Defendants responded by indicating his consent to this request and

the relief requested in this motion

**WHEREFORE** the instant motion should be granted.

Dated: September 27, 2010

Plaintiffs

by their Attorneys,

/s/ David J. Strachman

David J. Strachman

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## **CERTIFICATION**

I hereby certify that on September 27, 2010 I filed this motion via ECF which served the following counsel of record:

Deming E. Sherman Edwards Angell Palmer & Dodge LLP 2800 Bank Boston Plaza Providence, RI 02903

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/S/ David J. Strachman